

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CARMEN JOHN PERRI, and individual,

Plaintiff,

v.

425 QUEEN ANNE, LLC, a Washington  
limited liability company,

Defendant.

No. 2:19-cv-00137-JLR

425 QUEEN ANNE LLC'S  
STIPULATED MOTION AND  
~~PROPOSED~~ ORDER TO EXTEND  
TIME TO ANSWER COMPLAINT

NOTE ON MOTION CALENDAR:

FEBRUARY 28, 2019

Defendant 425 QUEEN ANNE, LLC hereby respectfully requests that, for the following reasons, the Court extend the deadline to file its Answer to the Complaint in this case to Thursday, March 14, 2019. By their signature below, the Plaintiff in this action stipulates to this Motion.

425 Queen Anne LLC respectfully submits that good cause exists for the extension for the following reasons:

1. The Defendant's counsel filed its appearance on February 20, 2019.
2. Counsel for the Defendant requires adequate time to review client records and confer.
3. An extension of time to file the Answer through March 14, 2019 will not substantially delay the case.

425 QUEEN ANNE LLC'S STIPULATED MOTION TO  
EXTEND TIME TO ANSWER COMPLAINT- 1  
2:19-cv-00137-JLR

**BERESFORD ♦ BOOTH PLLC**

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1 For the foregoing reasons, 425 Queen Anne, LLC respectfully requests an extension of  
2 time to Answer the Plaintiff's Complaint.

3  
4 Stipulated and Agreed this 28<sup>th</sup> day of February, 2019.

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6 THE LAW OFFICE OF DAN N. FIORITO, III BERESFORD BOOTH PLLC

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9 /s/ Dan N. Fiorito [by permission]  
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26 Attorneys for 425 Queen Anne LLC

27  
[PROPOSED] ORDER

Based on the Stipulation of the Parties, IT IS HEREBY ORDERED that;

The deadline for Defendant 425 Queen Anne LLC to Answer the Plaintiff's Complaint  
has been extended to March 14, 2019.

DONE IN OPEN COURT this 1 day of <sup>March</sup> ~~February~~, 2019.

  
HONORABLE JAMES L. ROBART

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28<sup>th</sup>, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the following attorneys/interested parties:

Dan N. Fiorito, III                      [dan@danfiorito.com](mailto:dan@danfiorito.com)  
Attorney for Plaintiff

By: /s/ Leah Bartoces  
Leah Bartoces, Paralegal